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ROLAND G. RIOPELLE MAURICE H. SERCARZ*

*ADMITTED IN NY & NJ

MEMO ENDORSED

November 30, 2022

BYECF

The Honorable Edgardo Ramos United States District Court Southern District of New York Thurgood Marshall U.S. Courthouse 40 Foley Square New York, NY 10007

Re:

Pretrial motions are due December 30, 2022. The government's response is due January 30, 2023. Reply is due January 27, 2023. SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: 12/2/2022 New York, New York

United States v. Markin, et al, 22 CR 395 Seth Markin - Defendant

Your Honor:

At the October 20, 2022 status conference, it was agreed that defense counsel would consult with the Government regarding motion practice and provide the Court with a schedule, based upon the consent of the parties, for the filing of pretrial motions in this case.

Consistent with the Court's Order, I have spoken with AUSA Nicholas Roos regarding my efforts to review the voluminous discovery in this case, some of the issues that may give rise to motion practice, and an appropriate schedule for the filing of these motions.

It was agreed by the parties that the defendant would file pretrial motions, if any, on or before December 30, 2022. The Government would have three weeks to file its answering papers on or before January 20, 2023; and, the defense would have until January 27, 2023 to file its reply.

As indicated, the Government agrees to this schedule.

Accordingly, we request that the Court enter an Order approving this plan for the filing of pretrial motions.

Most respectfully,

/s/Maurice H. Sercarz